REGION X



1200 SIXTH AVENUE SEATTLE, WASHINGTON 98101

REPLY TO ATTN OF:

Mail Stop 513

MAY 17 1979

Mr. P. B. Norgaard Atlantic Richfield Company P.O. Box 360 Anchorage, Alaska 995]0

Dear Mr. Norgaard:

We have evaluated your application to modify the production facilities at the Prudhoe Bay oil field in Prudhoe Bay, Alaska, pursuant to the requirements of the federal regulations for the Prevention of Significant Deterioration (PSD). We find that the proposal will employ best available control technology (BACT) and will not cause violations of any known PSD air quality increment or National Ambient Air Quality Standards (NAAQS).

Accordingly, on the basis of the August 2, 1978 PSD permit application and supplementary information submitted on November 7, 1978, EPA hereby grants its approval to Atlantic Richfield Company and SOHIO Petroleum Company to add eleven gas turbines to the Prudhoe Bay oil field complex, subject to the terms and conditions contained in the enclosed permit. Also enclosed is EPA's Final Determination Analysis Document for this project.

If you have any questions regarding the enclosures please feel free to contact Michael Johnston of my staff at (206) 442-1387.

Sincerely,

Donald P. Dubois

Regional Administrator

2 Enclosures

cc: G. N. Nelson, SOHIO, w/o encl

W. P. Metz, ARCO, w/o encl
Bob Chivvis, EPA, AOO w/o encl
D. E. Dias, SOHIO, w/o encl
Tom Hanna, ADEC, w/o encl
Ernst Mueller, Commissioner, ADEC, w/o encl
Rich Biondi, EPA, w/o encl
Mike Trutna, EPA, w/o encl

U.S. ENVIRONMENTAL PEROTECTION AGENCY

REGION 10

SEATTLE, WASHINGTON 98101

APPLICATION OF:

Atlantic Richfield Company
P. O. Box 360
Anchorage, Alaska 99510
AND

SOHIO Petroleum Company
Pouch 6-612
Anchorage, Alaska 99502
)

NO. PSD-X79-05
APPROVAL OF APPLICATION
TO CONSTRUCT

Pursuant to the Agency regulations for the Prevention of Significant Deterioration of Air Quality (PSD) set forth at Title 40, Code of the Federal Regulations, Part 52 and based upon information submitted on August 2, 1978 and November 7, 1978 by the Atlantic Richfield Company and the SOHIO Petroleum Company, the Regional Administrator now finds as follows:

FINDINGS

1. The Atlantic Richfield Company and the SOHIO Petroleum Company (hereafter referred to as ARCO/SOHIO) propose to install eleven natural gas fired turbines at the Prudhoe Bay oil field complex, Prudhoe Bay, Alaska.

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- 2. An analysis of projected emissions indicates that this project has the potential to emit more than 250 tons per year of nitrogen oxides (NO_X) , hydrocarbons (HC), and carbon monoxide (CO), and is therefore subject to PSD review for those pollutants.
- 3. The proposed modification is located in an area designated as "Class II" under Section 162(b) of the Clean Air Act.
- 4. Modeling analyses of CO, NO_X, and HC have been conducted and demonstrate that while emissions of these pollutants will increase, the modification will not cause any violations of the applicable National Ambient Air Quality Standards or PSD increments so long as the plant is operated in accordance with the conditions specified below. With the application of best available control technology, as required by Section 165(a)(4), operation of the proposed turbines will meet the applicable PSD requirements.

Accordingly, it is hereby determined that, subject to the conditions set forth below, Atlantic Richfield Company and SOHIO Petroleum Company will be permitted to perform the installation of the turbines to the existing facilities at Prudhoe Bay, Alaska.

APPROVAL CONDITIONS

1. Emissions of nitrogen oxides (NO_{χ}) , hydrocarbon (HC), and carbon monoxide (C0) shall not exceed the following:

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CONCENTRATION **POLLUTANT** 1 QUANTITY NO_{X} 2 150(14.4) Parts per million (ppm) 0.019 (at 15% oxygen) tons/yr/HF 3 42.0 pounds per million cubic feet of gas burned ($1b/10^6$ CF) HC 115.0 lb/106CF CO 5 Y = Manufacturer's rated heat rate at peak load (Kilojoules 6 per watt hour) 7 With the exception of NO, HC, and CO, increases in 8 potential emissions of any pollutant regulated under the 9 Clean Air Act resulting from this modification will be less 10 than 250 tons per year. 11 ARCO/SOHIO shall notify Alaska Department of Environ-12 mental Conservation (ADEC) of any occurrence of any emissions 13 in excess of limits specified in Condition Numbers 1 and 2 14 above; such notification shall be forwarded to ADEC in 15 writing in a timely fashion and in each instance no later 16 than ten (10) days from the date of such occurrence. The 17 notification shall include an estimate of the resultant 18 emissions and a narrative report of the cause, duration and 19 steps taken to correct the problem and avoid a recurrence. 20 ARCO/SOHIO shall contemporaneously send a copy of all such 21 reports to EPA. 22 This approval shall become void if on-site construction 23 is not commenced within eighteen (18) months after receipt 24 of the approval or if on-site construction once initially 25 commenced is discontinued for a period of eighteen (18) 26 months. 27 As approved and conditioned by this permit any con-28 struction, modification or operation of the proposed 29 facility shall be in accordance with the application 30 31 32 APPROVAL OF APPLICATION TO CONSTRUCT - Page 3 of 5

which resulted in this permit. Moreover, any such activity which is undertaken by ARCO/SOHIO, or others acting under the direction of ARCO/SOHIO in a manner which is inconsistent with this permit shall subject the Atlantic Richfield Company and the SOHIO Petroleum Company to EPA enforcement activities under the Clean Air Act.

6. ARCO/SOHIO shall be subject to Section 114 of the Clean Air Act. Section 114 requirements include but are not limited to:

a. Compliance Demonstration:

Within 60 days after achieving the maximum production rate at which the turbines will be operated, but not later than 180 days after initial startup of the expansion project, NO_x shall be tested as required under Federal New Source Performance Standards (NSPS) (40 CFR 60.335). No compliance testing is required for HC or CO.

b. Emission Monitoring:

In addition to the NSPS monitoring requirements (40 CFR 60.334), a continuous monitoring system shall be installed and operated to measure and record the fuel consumption for each turbine. This system shall be accurate to within \pm 5.0 percent. All fuel consumption records shall be maintained for a period of two years and shall be available for inspection by ADEC and EPA upon request.

7. EPA and ADEC shall be notified of the commencement of construction date within thirty (30) days of the date construction begins.

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Access to the source by EPA or State regulatory personnel will be permitted upon request for the purpose of compliance assurance inspections. Failure to allow such access is grounds for revocation of this permit.

MAY 17 1979 Date

Donald P. Dubois
Regional Administrator

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